

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

Docket No. 13-CR-00151

VS

DECLARATION

Ryan C. Lander

The undersigned attorney duly admitted to practice before this Court affirms the following under penalty of perjury:

1. The undersigned is the attorney for the Defendant, Ryan C. Lander in the above action.
2. The parties appeared before the Court on July 5, 2017 to discuss the issue of the waiver of the attorney client privilege which has arisen as the result of the Defendant's motion seeking reconsideration of the order denying his motion to set aside his guilty plea. (DKT#88).
3. Attached to the Defendant's affidavit in support of his reconsideration motion is a letter from the Defendant to the Court dated July 6, 2016. (DKT# 104). In the letter there appears the phrase "... even though I assert my innocence to the charges." (DKT#104 at 4).
4. The undersigned and the Defendant spoke by telephone on July 6,

2016 at which time the Defendant authorized me to withdraw the claim of innocence. Accordingly the Defendant withdraws the claim of innocence.

5. As a result of the withdrawal of this allegation, the waiver of the attorney client privilege resulting from the filing of the reconsideration motion does not include any communications touching on this topic.

Dated: Buffalo, New York
July 6, 2017

S/ Patrick J. Brown

Patrick J. Brown